

# **EXHIBIT A**

**Ben-Sorek, Liora M**

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**From:** Ben-Sorek, Liora M  
**Sent:** Friday, December 11, 2015 2:25 PM  
**To:** 'Fred Brewington'  
**Subject:** RE: Sharpe v. County of Nassau, et al.; CV-15-6446 (ADS) (AYS)

You are overlooking the fact that there may have been an Internal Affairs investigation or some other complaint lodged by or on behalf of your client for which a report was prepared. Once again, I do not know if that is the case. Thus, there are records which would be obtained by virtue of the unsealing order that would absolutely be subject to confidentiality.

Let's please stop going around in circles.

*Liora M. Ben-Sorek*  
Deputy Bureau Chief  
Litigation Bureau  
Nassau County Attorney's Office  
One West Street  
Mineola, New York  
Phone (516) 571-3014  
Fax (516) 571-3058

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**From:** Fred Brewington [mailto:[fred@brewingtonlaw.com](mailto:fred@brewingtonlaw.com)]  
**Sent:** Friday, December 11, 2015 2:18 PM  
**To:** Ben-Sorek, Liora M  
**Cc:** Precilla Lockett; Ira Foglgaren; Gregory Calliste  
**Subject:** RE: Sharpe v. County of Nassau, et al.; CV-15-6446 (ADS) (AYS)

Thank being the case, there is no need to placing confidentiality terms in the stipulation you sent for me and my client to agree to.

**FREDERICK K. BREWINGTON, ESQ.**  
LAW OFFICES OF  
FREDERICK K. BREWINGTON  
556 Peninsula Boulevard  
Hempstead, New York 11550  
(516) 489-6959  
e-mail: [fred@brewingtonlaw.com](mailto:fred@brewingtonlaw.com)  
[www.brewingtonlaw.com](http://www.brewingtonlaw.com)

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**From:** Ben-Sorek, Liora M [mailto:[lbensorek@nassaucountyny.gov](mailto:lbensorek@nassaucountyny.gov)]  
**Sent:** Friday, December 11, 2015 2:15 PM  
**To:** Fred Brewington <[fred@brewingtonlaw.com](mailto:fred@brewingtonlaw.com)>  
**Subject:** RE: Sharpe v. County of Nassau, et al.; CV-15-6446 (ADS) (AYS)

The documents you possess are presumably from representing Ms. Sharpe through the criminal proceedings. I do not have those items. As stated in my previous message, since Ms. Sharpe's records are under seal, I am not yet aware of the universe of documents which may exist.

*Liora M. Ben-Sorek*  
Deputy Bureau Chief  
Litigation Bureau  
Nassau County Attorney's Office  
One West Street  
Mineola, New York  
Phone (516) 571-3014  
Fax (516) 571-3058

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**From:** Fred Brewington [mailto:[fred@brewingtonlaw.com](mailto:fred@brewingtonlaw.com)]  
**Sent:** Friday, December 11, 2015 2:04 PM  
**To:** Ben-Sorek, Liora M  
**Cc:** Gregory Calliste; Precilla Lockett; Ira Fogelgaren  
**Subject:** RE: Sharpe v. County of Nassau, et al.; CV-15-6446 (ADS) (AYS)

I will not agree to confidentiality on items that I already have, are in the public already and which and on those things that make it clear that Defendants committed crimes and other violations. Unless you can identify what you claim to be confidential, your blanket request is not something with which I can agree.

**FREDERICK K. BREWINGTON, ESQ.**  
LAW OFFICES OF  
FREDERICK K. BREWINGTON  
556 Peninsula Boulevard  
Hempstead, New York 11550  
(516) 489-6959  
e-mail: [fred@brewingtonlaw.com](mailto:fred@brewingtonlaw.com)  
[www.brewingtonlaw.com](http://www.brewingtonlaw.com)

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**From:** Ben-Sorek, Liora M [<mailto:iben-sorek@nassaucountyny.gov>]  
**Sent:** Friday, December 11, 2015 1:58 PM  
**To:** Fred Brewington <[fred@brewingtonlaw.com](mailto:fred@brewingtonlaw.com)>  
**Subject:** RE: Sharpe v. County of Nassau, et al.; CV-15-6446 (ADS) (AYS)

Since your client's records are sealed, I do not yet know the universe of what documents exist. However, we do intend to have a Confidentiality Order in place. Since the records we seek are County records, there is a strong probability that some, if not all, of those documents will be deemed confidential. Is your e-mail below meant to convey that you will not enter into a Confidentiality Agreement in this lawsuit?

*Liora M. Ben-Sorek*  
Deputy Bureau Chief  
Litigation Bureau  
Nassau County Attorney's Office  
One West Street  
Mineola, New York  
Phone (516) 571-3014  
Fax (516) 571-3058

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**From:** Fred Brewington [<mailto:fred@brewingtonlaw.com>]  
**Sent:** Friday, December 11, 2015 1:31 PM  
**To:** Ben-Sorek, Liora M  
**Cc:** Precilla Lockett; Gregory Calliste; Ira Fogelgaren  
**Subject:** RE: Sharpe v. County of Nassau, et al.; CV-15-6446 (ADS) (AYS)

In looking at your proposed stipulation, please remove your WHEREAS clauses. Additionally, Plaintiff does not agree to the materials being confidential between the Plaintiff and Defendant as Plaintiff will not agree to be silenced about the injustice and abuse of process into which the Defendants have engaged. Accordingly, Defendants may only use the unsealed information for purposes associated with this litigation, but Plaintiff is under no such obligation. If you would like to amend your proposed stipulation, we will review it then.

**FREDERICK K. BREWINGTON, ESQ.**  
LAW OFFICES OF  
FREDERICK K. BREWINGTON  
556 Peninsula Boulevard  
Hempstead, New York 11550  
(516) 489-6959

e-mail: [fred@brewingtonlaw.com](mailto:fred@brewingtonlaw.com)  
[www.brewingtonlaw.com](http://www.brewingtonlaw.com)

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**From:** Ben-Sorek, Liora M [<mailto:lben-sorek@nassaucountyny.gov>]  
**Sent:** Friday, December 11, 2015 12:26 PM  
**To:** Fred Brewington <[fred@brewingtonlaw.com](mailto:fred@brewingtonlaw.com)>  
**Cc:** Precilla Lockett <[precilla.lockett@brewingtonlaw.com](mailto:precilla.lockett@brewingtonlaw.com)>  
**Subject:** Sharpe v. County of Nassau, et al.; CV-15-6446 (ADS) (AYS)

Dear Mr. Brewington:

In connection with the above-referenced litigation, please find attached a stipulation and authorization to unseal the criminal files pertaining to your client. Kindly return signed copies by e-mail, with originals by mail.

Thank you for your anticipated cooperation to this request.

Very truly yours,

Liora Ben-Sorek

*Liora M. Ben-Sorek*  
Deputy Bureau Chief  
Litigation Bureau  
Nassau County Attorney's Office  
One West Street  
Mineola, New York  
Phone (516) 571-3014  
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